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*Attorneys for Defendants Cleveland-Cliffs, Inc and
The Cleveland-Cliffs Steamship Company*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN STEAMSHIP OWNERS MUTUAL : Civil Action No. 04-CV-4309 (LAK)
PROTECTION AND INDEMNITY
ASSOCIATION, INC., : (ECF CASE)

Plaintiff, :

v. :

ALCOA STEAMSHIP CO., INC., et al., : STATEMENT PURSUANT
TO RULE 7.1

Defendants. :

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Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and to enable judges and magistrates of the Court to evaluate possible disqualification and recusal, the undersigned counsel of record for erroneously named Defendant Cleveland-Cliffs, Inc certifies that (1) it has no parent corporation; (2) no publicly-held corporation owns ten percent (10%) or more of its stock; and (3) it was erroneously named on Ex. A to the Second Amended Complaint, dated July 8, 2004, as the successor to The Cleveland-Cliffs Steamship Company when it is not the successor, rather it is the parent corporation of The Cleveland-Cliffs Steamship Company.

Dated: New York, New York
October 8, 2004

PROSKAUER ROSE LLP

By: /s/ Dale A. Schreiber
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-and-

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